

Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278e)

Filer's Information

TRULIO, DAVID
Senior Advisor/Chief of Staff to USD(P), OSD Policy, Office of the Secretary of Defense
Date of Appointment: 06/13/2018

Other Federal Government Positions Held During the Preceding 12 Months: None

Electronic Signature - I certify that the statements I have made in this form are true, complete and correct to the best of my knowledge.
eSigned in FDM by:
DAVID TRULIO
User ID: 56126a6295e432da75468d105f67ac03438f40b373e1120fc7ca647ba0ae91a243859b33b0b6
10/03/2018

Agency Ethics Official's Opinion - On the basis of information contained in this report. I conclude that the filer is in compliance with applicable laws and regulations(Subject to any comments below).
eSigned in FDM by:
JEFFREY A. GREEN
User ID: 27e2c5bf98d74258ebce40e5e39c42df918f0fe3ab52ceac70e0d240e4d55c8c22fc2065
10/10/2018

Other review conducted by
Supervisor:
eSigned in FDM by:
JOHN ROOD
User ID: 6accb2c9d816d3986796d7c884fb80dc2ce990a4b1dcd4260020cfa6271cc0be3a8c1ae85a49
10/10/2018

U.S. Office of Government Ethics Certification

1. Filer's Positions Held Outside United States Government

#	NAME	CITY, STATE	OGE TYPE	POSITION	FROM	TO
1	Artis Corporation	Scottsdale, AZ, USA	Non-Profit Organiza tion	Director	09/2016	09/2018
2	Artis Research	Scottsdale, AZ, USA	Business Enterprise	Senior Fellow	06/2011	09/2018

3	Brazil-U.S. Business Council	Washington, DC, USA	part of US Chamber of Commerce	Director	12/2016	05/2018
4	Center for Cyber and Homeland Security	Washington, DC, USA	Think tank at Georgie Washington U.	Sr. Fellow (non-resident)	03/2009	09/2017
5	Grand Canyon Partners, Inc.	Phoenix, AZ, USA	Business Enterprise	Director	12/2014	09/2018
6	Lockheed Martin Corporation	Arlington, VA, USA	Business Enterprise	Employee	10/2016	05/2018
7	Raytheon Company	Arlington, VA, USA	Business Enterprise	Employee	05/2009	10/2016
8	U.S.-Argentina Business Council	Washington, DC, USA	part of US Chamber of Commerce	Lockheed rep to council	05/2017	05/2018
9	World Affairs Council - Washington, DC	Washington, DC, USA	Non-Profit Organization	Director	10/2013	10/2016

2. Filer's Employment Assets & Income and Retirement Accounts

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Fidelity Brokeragelink: Raytheon	No			
1.1	Fidelity Select Energy (FSENX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.2	Fidelity Select Gold (FSAGX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.3	First Eagle Overseas Class A (SGOVX)	Yes	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
1.4	Akre Focus Fund Retail (AKREX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.5	Tocqueville Gold Fund (TGLDX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
1.6	IShares Silver TR IShares (SLV)	Yes	\$1,001 - \$15,000		None (or less than \$201)
1.7	SPDR Gold TR Gold SHS (GLD)	Yes	\$1,001 - \$15,000		None (or less than \$201)
2	Fidelity RAYSIP: Raytheon	No			
2.1	VANG IS TL STK MK IP (VITPX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.2	NT S&P 500 INDEX	Yes	\$50,001 - \$100,000		None (or less than \$201)
2.3	NT ACWI EX-US IDX DC	Yes	\$15,001 - \$50,000		None (or less than \$201)
2.4	BROCK GOVT SHRT TERM	No	\$15,001 - \$50,000		None (or less than \$201)
3	Voya: Lockheed Martin Savings Plan	No			
3.1	Target Date Fund 2040	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.2	Target Date Fund 2045	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.3	Lockheed Martin, ESOP	N/A	\$15,001 - \$50,000		None (or less than \$201)
4	Voya Lockheed Martin Capital Accumulation Plan	No			
4.1	Target Date Fund 2040	Yes	\$15,001 - \$50,000		None (or less than \$201)
5	Voya Lockheed Martin Nonqualified Capital Accumulation Plan	No			None (or less than \$201)
5.1	Target Date Fund 2040	Yes	\$1,001 - \$15,000	Cash out	\$1,139
6	Morgan Stanley: Lockheed Martin	No			
6.1	Lockheed Martin stock (LMT)	N/A	\$15,001 - \$50,000	Dividends	\$2,501 - \$5,000

6.2	Morgan Stanley Wealth Management Cash Account	N/A	\$1,001 - \$15,000	None (or less than \$201)
7	Raytheon Deferred Compensation	No		
7.1	RISP Account	No		
7.1.1	FIMM Government Portfolio Instl (FRGXX)	Yes	\$1,001 - \$15,000	None (or less than \$201)
7.1.2	NTGI S&P 500 Equity Index NL Tier 4	Yes	\$1,001 - \$15,000	None (or less than \$201)
7.1.3	NTGI Russell 2000 Index NL Tier 4	Yes	\$1,001 - \$15,000	None (or less than \$201)
7.1.4	NTGI All Country World Index ex US NL Tier 4	Yes	None (or less than \$1,001)	None (or less than \$201)
7.2	Deferral Account Raytheon	N/A		
7.2.1	FIMM Fovernment Portfolio Instl - FRGXX	Yes	\$1,001 - \$15,000	None (or less than \$201)
7.2.2	NTGI S&P 500 Equity Index NL Tier 4	Yes	\$1,001 - \$15,000	None (or less than \$201)
7.2.3	NTGI Russel 2000 Index NL Tier 4	Yes	\$1,001 - \$15,000	None (or less than \$201)
7.2.4	NTGI All Country World Index ex US NL Tier 4	Yes	\$1,001 - \$15,000	None (or less than \$201)
8	Lockheed Martin Corporation	N/A	Multiple types	\$1090000

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR OTHER PARTY TO AGREEMENT/ARRANGEMENT	CITY/STATE	STATUS AND TERMS	DATE
1	Grand Canyon Partners, Inc.	Phoenix, AZ, USA	Liquidation amount is forthcoming.: \$29K loan agreem ent to provide startup capital for this business. Complete closure & liquidation will be complete by this fall.	07/2015
2	Lockheed Martin Corporation	Bethesda, MD, USA	Defined contribution: I continue to hold a retirement plan identified under Assets. Neither Lockheed nor I continue to contribute to the retirement plan.	10/2016
3	Lockheed Martin Corporation	Bethesda, MD, USA	Severance: I executed an integrated set of agmts in connection with my separation from LM. No future payments will be made under the agmts.	05/2018
4	Raytheon Company	Waltham, MA, USA	Raytheon Company Deferred Compensation Plan: I continue to hold this deferred comp plan; neither Raytheon nor I continue to contribute to the plan accounts. See Assets.	05/2009

4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Lockheed Martin Corporation	Arlington, VA	VP, International Government Affairs, Operations, and Regional Executive for Latin America. Supported int'l gov't affairs work of Lockheed Martin.
2	Raytheon Company	Arlington, VA	Director of Operations, Raytheon International, Inc. Supported Raytheon's international marketing and business development team.

5. Spouse's Employment Assets & Income and Retirement Accounts

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Spouse Virginia Retirement System (Fairfax County)	N/A	\$15,001 - \$50,000		None (or less than \$201)

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S. Domestic Bank #1	N/A	\$250,001 - \$500,000		None (or less than \$201)
2	U.S. Domestic Bank #2	N/A	\$15,001 - \$50,000		None (or less than \$201)
3	U.S. Domestic Bank #3	N/A	\$1,001 - \$15,000		None (or less than \$201)
4	U.S. Domestic Bank #4	N/A	\$1,001 - \$15,000		None (or less than \$201)
5	Fidelity Cash Account	N/A	\$1,001 - \$15,000		None (or less than \$201)
5.1	Fidelity 500 Index Investor Class (FUSEX)	Yes	\$1,001 - \$15,000	Dividends, Capital Gains	\$201 - \$1,000
6	Fidelity Roth IRA	No			
6.1	Fidelity Select Gold (FSAGX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
6.2	Tocqueville Gold Fund (TGLDX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
7	Fidelity Traditional IRA	No			
7.1	Fidelity 500 Index Investor Class (FUSEX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
7.2	ConocoPhillips COM (COP)	No	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
7.3	Exxon Mobil Corp (XOM)	No	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
8	TDA Brokerage Account	No			
8.1	Barrick Gold Corp (ABX)	No	\$1,001 - \$15,000		None (or less than \$201)
8.2	Denison Mines Corp (DNN)	No	\$1,001 - \$15,000		None (or less than \$201)
8.3	First Majestic Silver Corp (AG)	No	\$1,001 - \$15,000		None (or less than \$201)
8.4	Newmont Mining Corp (NEM)	No	\$1,001 - \$15,000		None (or less than \$201)
8.5	Wheaton Precious Metals Corp (WPM)	No	\$1,001 - \$15,000		None (or less than \$201)
8.6	GlaxoSmithKline plc (GSK)	N/A	\$1,001 - \$15,000		None (or less than \$201)
8.7	Exxon Mobil Corporation (XOM)	N/A	\$1,001 - \$15,000		None (or less than \$201)
8.8	ConocoPhillips (COP)	N/A	\$1,001 - \$15,000	Dividends, Capital Gains	\$201 - \$1,000
8.9	Suncor Energy Inc. (SU)	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
9	TD Ameritrade Roth	No			None (or less than \$201)

9.1	Duke Energy Holdings Corp (DUK)	No	\$1,001 - \$15,000	None (or less than \$201)
9.2	Goldman Sachs Group Inc (GS)	No	\$1,001 - \$15,000	None (or less than \$201)
10	Vanguard Traditional IRA Brokerage	No		
10.1	Vanguard Federal Money Market Fund (cash)	No	\$1,001 - \$15,000	None (or less than \$201)
10.2	Vanguard 500 Index Fund Admiral Shares (VFIAX)	Yes	\$15,001 - \$50,000	\$201 - \$1,000
11	Vanguard Roth IRA	No		
11.1	Vanguard 500 Index Fund Admiral Shares (VFIAX)	Yes	\$50,001 - \$100,000	\$1,001 - \$2,500
12	Spouse Vanguard Traditional IRA	No		
12.1	Vanguard Equity Income Fund Investor Shares (VEIPX)	Yes	\$1,001 - \$15,000	\$201 - \$1,000
12.2	Vanguard 500 Index Fund Admiral Shares (VFIAX)	Yes	\$15,001 - \$50,000	\$1,001 - \$2,500
12.3	Vanguard Federal Money Market Fund (VMFXX) (cash)	No	\$1,001 - \$15,000	None (or less than \$201)
13	Spouse Vanguard Roth IRA	No		
13.1	Vanguard 500 Index Fund Admiral Shares (VFIAX)	Yes	\$50,001 - \$100,000	\$1,001 - \$2,500
14	Virginia Invest529: DC #1 - 2030 Portfolio	Yes	\$15,001 - \$50,000	None (or less than \$201)
15	Virginia Invest529 DC 2 2033 Portfolio	Yes	\$1,001 - \$15,000	None (or less than \$201)
16	Virginia Invest529 DC 3 2033 Portfolio	Yes	\$1,001 - \$15,000	None (or less than \$201)
17	Virginia Invest529: 2033 Portfolio DC #1	Yes	\$1,001 - \$15,000	None (or less than \$201)
18	Virginia Invest529: 2033 Portfolio DC #2	Yes	\$1,001 - \$15,000	None (or less than \$201)
19	Virginia Invest 529: 2033 Portfolio DC #3	Yes	\$1,001 - \$15,000	None (or less than \$201)
20	Virginia Invest 529: 2030 Portfolio DC #1	Yes	\$1,001 - \$15,000	None (or less than \$201)
21	Grand Canyon Partners, Inc.	No	\$15,001 - \$50,000	None (or less than \$201)
22	Gold coins	N/A	\$15,001 - \$50,000	None (or less than \$201)
23	Silver coins	N/A	\$1,001 - \$15,000	None (or less than \$201)

7. Transactions

This report has no reported **Transactions**

8. Liabilities

#	CREDITOR NAME	TYPE OF LIABILITY	AMOUNT	YEAR INCURRED	INTEREST RATE	TERM
1	Firstmark Services - Student Loan	Loan	\$15,001 - \$50,000	2002	3.13%	15 years
2	U.S. Department of Education	Loan	\$15,001 - \$50,000	2002	2.625%	Extended/month

9. Gifts and Travel Reimbursements

This report has no reported **Gifts and Reimbursements**

Summary of Contents

1. Filer's Positions Held Outside United States Government

Part 1 discloses positions that the filer held at any time during the reporting period (excluding positions with the United States Government). Positions are reportable even if the filer did not receive compensation. This section does not include the following: (1) positions with religious, social, fraternal, or political organizations; (2) positions solely of an honorary nature; (3) positions held as part of the filer's official duties with the United States Government; (4) mere membership in an organization; and (5) passive investment interests as a limited partner or non-managing member of a limited liability company.

2. Filer's Employment Assets & Income and Retirement Accounts

Part 2 discloses the following:

- Sources of earned and other non-investment income of the filer totaling more than \$200 during the reporting period (e.g., salary, fees, partnership share, honoraria, scholarships, and prizes)
- Assets related to the filer's business, employment, or other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

3. Filer's Employment Agreements and Arrangements

Part 3 discloses agreements or arrangements that the filer had during the reporting period with an employer or former employer (except the United States Government), such as the following:

- Future employment
- Leave of absence
- Continuing payments from an employer, including severance and payments not yet received for previous work (excluding ordinary salary from a current employer)
- Continuing participation in an employee welfare, retirement, or other benefit plan, such as pensions or a deferred compensation plan
- Retention or disposition of employer-awarded equity, sharing in profits or carried interests (e.g., vested and unvested stock options, restricted stock, future share of a company's profits, etc.)

4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

Part 4 discloses sources (except the United States Government) that paid more than \$5,000 in a calendar year for the filer's services during any year of the reporting period. The filer discloses payments both from employers and from any clients to whom the filer personally provided services. The filer discloses a source even if the source made its payment to the filer's employer and not to the filer. The filer does not disclose a client's payment to the filer's employer if the filer did not provide the services for which the client is paying.

5. Spouse's Employment Assets & Income and Retirement Accounts

Part 5 discloses the following:

- Sources of earned income (excluding honoraria) for the filer's spouse totaling more than \$1,000 during the reporting period (e.g., salary, consulting fees, and partnership share)

- Sources of honoraria for the filer's spouse greater than \$200 during the reporting period
- Assets related to the filer's spouse's employment, business activities, other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's spouse's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF). Amounts of income are not required for a spouse's earned income (excluding honoraria).

6. Other Assets and Income

Part 6 discloses each asset, not already reported, that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in investment income during the reporting period. For purposes of the value and income thresholds, the filer aggregates the filer's interests with those of the filer's spouse and dependent children. This section does not include the following types of assets: (1) a personal residence (unless it was rented out during the reporting period); (2) income or retirement benefits associated with United States Government employment (e.g., Thrift Savings Plan); and (3) cash accounts (e.g., checking, savings, money market accounts) at a single financial institution with a value of \$5,000 or less (unless more than \$200 of income was produced). Additional exceptions apply. Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

7. Transactions

Part 7 discloses purchases, sales, or exchanges of real property or securities in excess of \$1,000 made on behalf of the filer, the filer's spouse or dependent child during reporting period. This section does not include transactions that concern the following: (1) a personal residence, unless rented out; (2) cash accounts (e.g., checking, savings, CDs, money market accounts) and money market mutual funds; (3) Treasury bills, bonds, and notes; and (4) holdings within a federal Thrift Savings Plan account. Additional exceptions apply.

8. Liabilities

Part 8 discloses liabilities over \$10,000 that the filer, the filer's spouse or dependent child owed at any time during the reporting period. This section does not include the following types of liabilities: (1) mortgages on a personal residence, unless rented out (limitations apply for PAS filers); (2) loans secured by a personal motor vehicle, household furniture, or appliances, unless the loan exceeds the item's purchase price; and (3) revolving charge accounts, such as credit card balances, if the outstanding liability did not exceed \$10,000 at the end of the reporting period. Additional exceptions apply.

9. Gifts and Travel Reimbursements

This section discloses:

- Gifts totaling more than \$390 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$390 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.

For purposes of this section, the filer need not aggregate any gift or travel reimbursement with a value of \$156 or less. Regardless of the value, this section does not include the following items: (1) anything received from relatives; (2) anything received from the United States Government or from the District of Columbia, state, or local governments; (3) bequests and other forms of inheritance; (4) gifts and travel reimbursements given to the filer's agency in connection with the filer's official travel; (5) gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises; and (6) anything received by the filer's spouse or dependent children totally independent of their relationship to the filer. Additional exceptions apply.

Privacy Act Statement

Title I of the Ethics in Government Act of 1978, as amended (the Act), 5 U.S.C. app. § 101 et seq., as amended by the Stop Trading on Congressional Knowledge Act of 2012 (Pub. L. 112-105) (STOCK Act), and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with sections 105 and 402(b)(1) of the Act or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional

disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to another Federal agency, court or party in a court or Federal administrative proceeding when the Government is a party or in order to comply with a judge-issued subpoena; (4) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (5) to the National Archives and Records Administration or the General Services Administration in records management inspections; (6) to the Office of Management and Budget during legislative coordination on private relief legislation; (7) to the Department of Justice or in certain legal proceedings when the disclosing agency, an employee of the disclosing agency, or the United States is a party to litigation or has an interest in the litigation and the use of such records is deemed relevant and necessary to the litigation; (8) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another; (9) to a Member of Congress or a congressional office in response to an inquiry made on behalf of an individual who is the subject of the record; (10) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to an OGE Government-wide system of records; and (11) on the OGE Website and to any person, department or agency, any written ethics agreement filed with OGE by an individual nominated by the President to a position requiring Senate confirmation. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

Public Burden Information

This collection of information is estimated to take an average of three hours per response, including time for reviewing the instructions, gathering the data needed, and completing the form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Program Counsel, U.S. Office of Government Ethics (OGE), Suite 500, 1201 New York Avenue, NW., Washington, DC 20005-3917.

Pursuant to the Paperwork Reduction Act, as amended, an agency may not conduct or sponsor, and no person is required to respond to, a collection of information unless it displays a currently valid OMB control number (that number, 3209-0001, is displayed here and at the top of the first page of this OGE Form 278e).